

1 Kym Samuel Cushing, Esq.
2 Nevada Bar No. 004242
3 Dustin A. Johnson, Esq.
4 Nevada Bar No. 009306
5 **WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**
6 300 South Fourth Street, 11th Floor
7 Las Vegas, Nevada 89101
8 (702) 727-1400; FAX (702) 727-1401
9 kym.cushing@wilsonelser.com
10 dustin.johnson@wilsonelser.com
11 *Attorneys for Defendant Target Corporation*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JACI FERRERYA.

[CASE NO: 2:10-cv-01870-KJD-LRL]

Plaintiffs

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

TARGET CORPORATION, DOES 1 through 10, ;
and ROE ENTITIES 11-20, inclusive.

SUBMITTED IN COMPLIANCE WITH
LOCAL RULE 26-1(e)

Defendants

The above named parties, by and through their respective counsel of record, hereby submit the Stipulated Discovery Plan and Scheduling Order pursuant to FRCP 26(f) and Local Rule 26-1(e) for the Court's approval. This plan is submitted in compliance with the timing rules set forth in LR26-1(e), measured from the date of the 26(f) conference, November 15, 2010.

DISCOVERY PLAN

1. The Plaintiff requested an additional fourteen (14) days from the date of the Rule 26(f) Conference in which to make her initial disclosures pursuant to Fed.R.Civ.P. 26(a)(1). Defendant's initial disclosure of documents and witnesses was made on November 15, 2010. Plaintiff's initial disclosure of documents and witnesses shall be served no later than November 29, 2010.

2. The parties anticipate discovery may be needed on the issues of the respective liability, if any, of the parties and the damages, if any, sustained by the Plaintiff. The parties do not request that discovery be conducted in phases or be limited to or focused on particular issues.

3. The parties do not request that any changes be made to the limitations on discovery under the Federal Rules of Civil Procedure or the Local Rules of Practice of the United States District Court for the District of Nevada.

4. The parties do not request any other orders under the FRCP 26(c), FRCP 16(b) or FRCP 16(c).

PROPOSED SCHEDULE

1. **Discovery Cut-Off Date:** Defendants filed their answer to Plaintiff's Complaint on May 11, 2010. As stipulated between the parties, discovery will commence once the Discovery Plan has been submitted to the court. All discovery must be completed not later than April 25, 2011.

2. **Amendment of Pleadings and Addition of Parties:** Unless otherwise stated herein or ordered by the Court, the date for filing motions to amend the pleadings or to add parties shall not be later than ninety (90) days prior to the discovery cut-off date and not later than January 25, 2011.

3. **Disclosure of Expert Witnesses:** In accordance with FRCP 26(a)(2), disclosures identifying expert witnesses shall be made sixty (60) days prior to the discovery cut-off date and not later than **February 24, 2011**, and disclosures respecting rebuttal experts shall be made thirty (30) days after the disclosure of experts and not later than **March 28, 2011**.

4. **Interim Status Report:** On or before February 24, 2011, sixty (60) days prior to the close of discovery, the parties shall file an Interim Status Report, as required by LR 26-3, stating the time estimated for trial, three alternative dates for trial, and whether or not trial will be proceeding or affected by substantive motions.

5. **Dispositive Motions:** The filing of Dispositive Motions shall not be later than thirty (30) days after the discovery cut –off date and not later than May 25, 2011.

6. **Pretrial Order:** The Joint Pretrial Order shall be filed no later than thirty (30) days

1 after the date set for filing Dispositive Motions and not later than June 24, 2011. In the event
2 Dispositive Motions are filed, the date for filing the Joint Pretrial Order shall be suspended until
3 thirty (30) days after the decision of the Dispositive Motions or further order of the court.

4 **7. Extensions or Modifications of the Discovery Plan and Scheduling Order:**

5 In accordance with LR 26-4, any stipulations or motion for modification or extension of this
6 discovery plan and scheduling order must be made no later than twenty (20) days before the
7 discovery cut-off date, or no later than April 5, 2011.

8 DATED this 16 day of December, 2010. DATED this 8th day of December 2010.

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10 **WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER LLP**

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13 Kym Samuel Cushing, Esq.
14 Nevada Bar No. 004242
15 Dustin A. Johnson, Esq.
16 Nevada Bar No. 009306
17 300 South Fourth Street, 11th Floor
Las Vegas, Nevada 89101
18 *Attorneys for Defendant Target Corporation*

19 **RICHARD HARRIS LAW FIRM**

20
21 Richard A. Harris, Esq.
22 Nevada Bar No. 000505
23 Joshua R. Harris, Esq.
24 Nevada Bar No. 009580
25 801 S. Fourth Street
26 Las Vegas, Nevada 89101
27 *Attorneys for Plaintiff*

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19 IT IS SO ORDERED.

20 Dated this 16th day of December, 2010.

21
22 *CHLeavitt*

23 **UNITED STATES MAGISTRATE JUDGE**